

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

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|---------------------|---|--|
| JOE ANDREW SALAZAR, | § | |
| | § | |
| Plaintiff, | § | |
| | § | |
| vs. | § | Civil Action No. 2:16-CV-01096-JRG-RSP |
| | § | |
| HTC CORPORATION, | § | JURY TRIAL DEMANDED |
| | § | |
| Defendant. | § | |

**JOINT MOTION FOR EXTENSION OF TIME TO SUBMIT AGREED DOCKET
CONTROL ORDER AND AGREED DISCOVERY ORDER**

Plaintiff Joe Andrew Salazar (“Salazar”) and Defendant HTC Corporation (“HTC”), file this Joint Motion for Extension of Time to Submit Agreed Docket Control Order and Agreed Discovery Order and as good cause supporting this Motion the parties respectfully show as follows:

1. Pursuant to the Court’s Order (Doc. No. 9), the current deadline for the parties to submit a proposed docket control order and a proposed discovery order is April 10, 2017.
2. Salazar and HTC jointly move the Court for an order granting an extension of time for the parties to submit their agreed proposed docket control order and agreed proposed discovery order up to and including April 17, 2017. Grant of the requested extension will not unduly delay the orderly and expeditious preparation of this action for trial and such request is not sought solely for purposes of delay but only so that justice may be done.
3. A proposed order granting the relief requested in this motion is attached.

WHEREFORE, Salazar and HTC jointly request the Court to extend the parties' deadline to submit a proposed docket control order and a proposed discovery order up to and including April 17, 2017 and for such other and further relief as the Court deems suitable and just.

Dated: April 10, 2017

Respectfully submitted,



Andy Tindel w/ permission of Lead Attorney

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Attorneys for Defendant HTC Corporation

CERTIFICATE OF CONFERENCE

On April 10, 2017, undersigned counsel for Salazar communicated with Jerry Selinger, counsel for HTC, about extending the time for the parties to submit their agreed proposed orders and the parties agreed to jointly submit the foregoing motion seeking the Court's approval of said agreement and an order confirming the extension of time.



Andy Tindel

CERTIFICATE OF SERVICE

This is to certify that all known counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per E. Dist. Tex. Loc. Ct. R. CV-5(a)(3) on this the 10th of April, 2017. Any other known counsel of record will be served with a copy of this document by email and/or facsimile transmission



Andy Tindel